

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRENDAN McGUINNESS,

CIVIL ACTION NO. 05-11738-EFH

Plaintiff,

v.

JAMES R. BENDER,
LOIS RUSSO,
MICHAEL D. FARLEY,
JASON J. OLIVER,
DAVID M. SHAW,
JUAN MEZA,
JOHN A. BELAIR, and
JOHN A. FLOWERS,

Defendants.

MOTION TO ENLARGE TIME FOR RESPONDING TO DISCOVERY

The defendants, by counsel, move that the time for responding to the plaintiff's two sets of interrogatories, each entitled "Plaintiff's Request for Admissions and/or Interrogatories of Defendants, dated August 11, 2006, be enlarged up to and including **October 13, 2006**. As reason therefore, the defendants state that counsel requires additional time to meet with the defendants and prepare their discovery responses. Responding to this discovery will also require additional time due to the plaintiff's failure to propound his discovery in a standard format. Specifically, the first of plaintiff's two sets of interrogatories is directed to four different defendants, and both sets of interrogatories commingle interrogatories and admissions within each document. Finally, the additional time is required because of counsel's other litigation responsibilities, and because of the increasing number of cases assigned to this office.

Dated: September 11, 2006

Respectfully submitted,

NANCY ANKERS WHITE
Special Asst. Attorney General

/s/ William D. Saltzman
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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 11, 2006.

Dated: September 11, 2006

/s/ William D. Saltzman
William D. Saltzman